



Air Quality Permitting Statement of Basis

May 21, 2004

Tier I Operating Permit No. T1-030039

Mountain Home Air Force Base

Facility ID No. 039-00001

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FINAL

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Acronyms, Units, And Chemical Nomenclature

DEQ	Department of Environmental Quality
HDI	hexamethylene diisocyanate
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MHAFB	Mountain Home Air Force Base
PTC	Permit to Construct
USAF	United States Air Force

Public Comment / Affected States / U.S. Environmental Protection Agency Review Summary

A 30-day public comment period for the Mountain Home Air Force Base draft Tier I operating permit was held from in accordance with IDAPA 58.01.01.364, Rules for the Control of Air Pollution in Idaho.

IDAPA 58.01.01.008.01 defines *affected states* as: "*All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within 50 miles of the Tier I source.*" An affected state is provided the opportunity to comment on a proposed Tier I operating permit.

A review of the site location information included in the permit application indicates that the facility is not located with 50 miles of a state border.

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for draft Tier I Operating Permit No. T1-030039 in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed information provided by United States Air Force (USAF) regarding the operation of the Mountain Home Air Force Base (MHAFB) located near Mountain Home, Idaho. This information was submitted based on the requirements for an application to change a Tier I operating permit in accordance with IDAPA 58.01.01.380 through 01.386.

2. SUMMARY OF EVENTS

June 27, 2003	DEQ received a permit to construct (PTC) and Tier I modification application for a Hurst boiler and three CAT emergency generators.
July 24, 2003	DEQ declared the permit application complete.
November 20, 2002 Through December 22, 2002	A public comment period on the proposed PTC and Tier I operating permit application was provided, in accordance with IDAPA 58.01.01.209, .01.364, and .01.365. During this time, DEQ received no comments on the proposed permits.
January 14, 2004 Through February 28, 2004	DEQ provided the proposed PTC and Tier I operating permit to the Environmental Protection Agency. During this time, the Environmental Protection Agency made no comments on the proposed permits.

3. BASIS OF THE ANALYSIS

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- The PTC and Tier I operating permit amendment application, received June 27, 2003
- Guidance developed by the U.S. Environmental Protection Agency and DEQ
- Title V permits issued by other jurisdictions
- Tier I Operating Permit No. 039-00001 issued on October 29, 2002, to the USAF for the MHAFB

4. REGULATORY ANALYSIS

The Tier I operating permit amendment is being processed concurrently with PTC No. P-030037 in accordance with IDAPA 58.01.01.209.05.c. The modified PTC establishes emissions limits, operating, monitoring and recordkeeping requirements for the hospital's Hurst boiler and three emergency generators. Details regarding the facility description, process description, equipment listing, emissions estimates, facility classification, area classification, and Aerometric Information Retrieval System classification can be found in the statement of basis for PTC No. P-030037.

The conditions of PTC No. P-030037 have been added to Tier I Operating Permit No. 039-00001 issued on October 29, 2002. As such, this Tier I operating permit (No. T1-030039) replaces Tier I Operating Permit No. 039-00001, dated October 29, 2002; the terms and conditions of which shall no longer be in effect.

In addition to incorporating the terms and conditions of PTC No. P-030037, the applicant requested administrative changes to the Tier I operating permit.

The first administrative change was requested to correct a typographical error. The Tier I operating permit issued on October 29, 2002, contained an incorrect chemical abstract system number for hexamethylene diisocyanate (HDI). The HDI chemical abstract system number was corrected to 822-06-0 (Permit Condition 5.5).

The applicant also requested changes to the National Emission Standards for Hazardous Air Pollutants language in the Tier I operating permit facility-wide conditions. The applicant requested language to clarify that the USAF submits a speciated emission inventory to demonstrate compliance with minor source status. DEQ has added the requested language (Permit Condition 2.20).

The applicant also requested that DEQ add language to Permit Condition 2.20 (*National Emission Standard for Aerospace Manufacturing and Rework Facilities*) indicating that MHAFFB is a minor source for HAP emissions with regard to applicability to 40 CFR 63, Subpart GG. MHAFFB is minor with regard to 40 CFR 63, Subpart GG applicability. MHAFFB is required to retain records indicating their nonapplicable status pursuant to 40 CFR 63.1.(b)(3). The requirement should satisfy MHAFFB's request.

5. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply.

6. RECOMMENDATION

Based on the Tier I application and review of state rules and federal regulations, staff recommends that DEQ issue final administratively emended Tier I Operating Permit No. T1-030039.

MJS/sd

T1-030039